

WRIGHT, FINLAY & ZAK, LLP
Arnold L. Graff, Esq. SBN 269170
4665 MacArthur Court, Suite 280
Newport Beach, CA 92660
Tel: (949) 477-5050; Fax: (949) 608-9142
agraff@wrightlegal.net

Attorneys for Movant, US Bank Trust National Association, not in its Individual Capacity but
Solely as Owner Trustee for VRMTG Asset Trust

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

In Re:) Case No.: 24-30074-DM
) Chapter: 11
) R.S. No. ALG-1
LEGAL RECOVERY, LLC,)
) NOTICE OF HEARING ON
) MOVANT’S MOTION FOR RELIEF
Debtor-in-Possession.) FROM THE AUTOMATIC STAY
) PURSUANT TO 11 U.S.C. §§ 362(d)(1),
) (d)(2) AND (d)(4) (REAL PROPERTY)
)
) <u>HEARING:</u>
) Date: July 25, 2024
) Time: 9:30 am
) Judge: Honorable Dennis Montali
) Ctrm: Zoom or AT&T Conference
) Location: United States Bankruptcy Court
) 450 Golden Gate Ave., 16 th Floor
) San Francisco, CA

PLEASE TAKE NOTICE THAT a hearing on US BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET TRUST (“Movant”) Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 (the “Motion”) will be heard on July 25, 2024, at 9:30 a.m. The hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by telephone or video.

1 This Motion is being made pursuant to Local Bankruptcy Rule (“LBR”) 4001-1, 11
2 U.S.C. §§ 362(d)(1), (d)(2) and (d)(4), and Federal Rules of Bankruptcy Procedure (“FRBP”)
3 Rule 4001, and is based on this Notice of Motion and the grounds for relief from stay under 11
4 U.S.C. § 362 as set forth in the accompanying Motion, the Memorandum of Points and
5 Authorities in Support of the Motion, and the Declaration(s) in Support of the Motion being filed
6 concurrently herewith, the complete files and records in this action, the oral argument of counsel,
7 if any, and such other and further evidence as the Court might deem proper.

8 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to LBR 4001- 1(c), Movant has
9 filed and served its Motion with at least fourteen (14) days prior to the hearing date. Any party
10 seeking to oppose the Motion must appear personally or by counsel at the above noticed
11 preliminary hearing and indicate the basis of the opposition. Respondents opposing the Motion
12 are not required, but may file responsive pleadings, points and authorities or declarations for any
13 preliminary hearing. Failure to appear at the preliminary hearing, either personally or by counsel,
14 may deemed by the Court to be consent to the granting of the relief requested in the Motion.

15 **PLEASE TAKE FURTHER NOTICE THAT** the hearing will not be conducted in the
16 presiding judge’s courtroom but instead will be conducted by telephone or video. The
17 Bankruptcy Court’s website provides information regarding how to arrange an appearance at a
18 video or telephonic hearing. If you have questions about how to participate in a video or
19 telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat
20 feature on the Bankruptcy Court’s website.

21 Respectfully Submitted,

22 **WRIGHT, FINLAY & ZAK, LLP**

23 Dated: July 3, 2024

By: /s/ Arnold L. Graff

Arnold L. Graff, Esq.

Attorneys for Movant,